

UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA,
Plaintiff

v.

LEONARDO ALMONTE-RAMIREZ,
Defendant

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CASE NO.: 1:14-cr-00021-JL

MOTION TO CONTINUE

Now comes the Defendant in the above-captioned matter, Leonardo Almonte-Ramirez, by and through his attorney, William R. Sullivan, Jr., and hereby requests that this Honorable Court continue final pretrial hearing and jury trial in this matter now scheduled for October 24 and November 4, 2014, respectively.

As reasons for this request, the Defendant states the following:

1. He retained current counsel in this matter only on August 19, 2014.
2. Defense counsel timely requested all discovery from both the prosecutor and prior counsel.
3. Not until October 15, 2014, did defense counsel receive the information regarding the booking video, audio recordings with one-party authorization and the identity of the confidential informant. All of this information, apparently, was transmitted to prior counsel but not given to current counsel.
4. Given the late production of this material to defense counsel, and at no fault of the

Assistant U.S. Attorney, the Defendant needs additional time to prepare for trial and requests this Honorable Court in the interests of justice to allow one final continuance in this matter to a date convenient to the Court.

5. Defense counsel sought the assent of the prosecutor, Nick Abramson, who stated he would not assent and in fact would oppose this Motion.
6. Defense counsel has discussed this issue with the Defendant, who is in agreement to a continuance while he and defense counsel reviews the recently produced discovery in this case.

Under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), the time requested in this motion is excludable as the interests of justice served by this requested continuance outweigh the Government's interests.

Wherefore, the Defendant respectfully requests that the final pretrial hearing and trial in this matter be continued from October 24 and November 4, 2014, respectively, to later dates convenient to the Court sixty (60) days out.

Date: October 16, 2014

Respectfully submitted,
Defendant,
By his attorney,

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.
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CERTIFICATE OF SERVICE

I, William R. Sullivan, Jr., do hereby certify that the above Motion to Continue has, on this 16th day of October, 2014, been served on all parties or their attorneys of record via electronic filing.

/s/ William R. Sullivan, Jr.
William R. Sullivan, Jr.